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State of Illinois)
County of St. Clair) SS

BEFORE THE POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS

Environmental Protection Agency)
vs.) No. PCB
Sauget & Company)

C O M P L A I N T

The ENVIRONMENTAL PROTECTION AGENCY, by William J. Scott, Attorney General, complaining of SAUGET & COMPANY, states:

1) Before, on and since November 30, 1970, SAUGET & COMPANY has allowed open dumping at its solid waste disposal site in violation of Section 21(a) & (b) of the Environmental Protection Act (hereinafter "Act") and Rule 3.04 of the Rules and Regulations for Refuse Disposal Sites and Facilities (hereinafter "Land Rules"), effective pursuant to Section 49(c) of the Act.

2) Since November 30, 1970, SAUGET & COMPANY has allowed open burning at its waste disposal site in violation of Rule 3.05 of the Land Rules and Section 9(c) of the Act.

3) Since November 30, 1970, SAUGET & COMPANY has had no adequate fence at its waste disposal site in violation of Rule 4.03(a) of the Land Rules, effective pursuant to Section 49(c) of the Act.

4) Since November 30, 1970, SAUGET & COMPANY has had no proper shelter at its solid waste disposal site in violation of Rule 4.03(c) of the Land Rules, effective pursuant to Section 49(c) of the Act.

5) Since November 30, 1970, SAUGET & COMPANY has operated its

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solid waste disposal site without adequate provisions for fire protection in violation of Rule 4.04 of the Land Rules, effective pursuant to Section 49(c) of the Act.

6) Since November 30, 1970, SAUGET & COMPANY has allowed unsupervised unloading with no portable fences available and improper policing of the area in violation of Rule 5.04 of the Land Rules, effective pursuant to Section 49(c) of the Act.

7) Since November 30, 1970, SAUGET & COMPANY has not been spreading and compacting the refuse as it is admitted at its solid waste disposal site in violation of Rule 5.06 of the Land Rules, effective pursuant to Section 49(c) of the Act.

8) Since November 30, 1970, SAUGET & COMPANY has operated its solid waste disposal site without covering the refuse at the end of the working day in violation of Rule 5.07(a) of the Land Rules, effective pursuant to Section 49(c) of the Act.

9) Since November 30, 1970, SAUGET & COMPANY has disposed liquids and hazardous materials without prior approval from the department in violation of Rule 5.08 of the Land Rules, effective pursuant to Section 49(c) of the Act.

10) Since November 30, 1970, SAUGET & COMPANY has operated their sanitary landfill operation without insect and rodent control in violation of Rule 5.09 of the Land Rules, effective pursuant to Section 49(c) of the Act.

11) Since November 30, 1970, SAUGET & COMPANY has permitted unsanitary salvage operations in violation of Rule 5.10(a) of the Land Rules, effective pursuant to Section 49(c) of the Act.

12) Since November 30, 1970, SAUGET & COMPANY has permitted salvage operations near the face of the fill in violation of Rule 5.10(b) of the Land Rules, effective pursuant to Section 49(c) of the Act.

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13) Since November 30, 1970, SAUGET & COMPANY has been dumping refuse over a large impractical area at its solid waste disposal site in violation of Rule 5.03 of the Land Rules, effective pursuant to Section 49(c) of the Act.

14) Since November 30, 1970, SAUGET & COMPANY has permitted the salvage operations to interfere and delay the fill operation in violation of Rule 5.10(c) of Land Rules, effective pursuant to Section 49(c) of the Act.

15) Since November 30, 1970, SAUGET & COMPANY has allowed salvage materials to remain at the site in violation of Rule 5.10(d) of Land Rules, effective pursuant to Section 49(c) of the Act.

16) Since November 30, 1970, SAUGET & COMPANY has allowed scavenging operations in violation of Rule 5.12(a) of the Land Rules, effective pursuant to Section 49(c) of the Act.

17) Since November 30, 1970, SAUGET & COMPANY has permitted feeding farm or domestic animals in violation of Rule 5.12(b) of the Land Rules, effective pursuant to Section 49(c) of the Act.

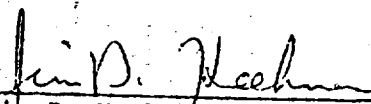
WHEREFORE: (a) The ENVIRONMENTAL PROTECTION AGENCY asks that a date be set for a hearing, not less than 21 days from the date of service of this Complaint, before a hearing officer designated by the Board, at which time SAUGET & COMPANY be required to answer the allegations of this Complaint.

(b) The ENVIRONMENTAL PROTECTION AGENCY asks for:

(1) the entry of an order directing SAUGET & COMPANY to cease and desist the aforesaid violations; and (2) the assessment of a penalty in the amount of \$10,000 plus \$1,000 for each day such violation shall be

shown to have continued.

ENVIRONMENTAL PROTECTION AGENCY
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by: Jim D. Keehner
Assistant Attorney General

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